

UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)
) Chapter 7
MICHAEL S. HELMSTETTER,)
) Bankruptcy No. 19-28687
Debtor.)

MOTION TO WITHDRAW

NOW COMES attorney Nicola S. Tancredi, of the Law Offices of Nicola S. Tancredi, of Oakbrook Terrace, IL (the “Attorney”), and for his Motion to Withdraw his Appearance on behalf of the Debtor, Michael S. Helmstetter, states as follows:

1. The undersigned counsel for the Debtor has been and continues to be physically compromised and incapacitated by Stage 3 Lung Cancer incidentally detected during a urological examination.
2. The undersigned counsel has undergone a series of intense tests and diagnostic procedures at the Northwestern Memorial Hospital, Robert H. Lurie Comprehensive Cancer Institute, including a Bronchoscopic Biopsy requiring general anesthesia on August 16, 2022.
3. A lobectomy was performed on the Attorney on September 16, 2022, which removed the entire lower lobe of the Attorney’s right lung. Post-surgical complications required hospitalization until September 21, 2022.
4. On October 13, 2022, the Attorney began 15 months of Chemotherapy and immunotherapy. The side effects of these therapies prohibits the Attorney from currently continuing legal representation of the Debtor.
5. Attached hereto is the Notification of Party Contact Information as required by Local Rule 83.17.

Wherefore Nicola S. Tancredi, of the Law Offices of Nicola S. Tancredi, of Oakbrook Terrace, Il., respectfully requests that this Honorable Court grant him leave to withdraw as counsel for the Debtor, Michael S. Helmstetter, and that the Court grant such other and further relief as it deems appropriate.

Respectfully Submitted,

/s/ Nicola S. Tancredi
Law Offices of Nicola S. Tancredi
Attorney for
Debtor Defendant Michael S. Helmstetter
Two Trans Am Plaza, Suite 250
Oakbrook Terrace, IL 60181
ARDC No. 2795736

CERTIFICATE OF SERVICE

I, Nicola S. Tancredi, hereby certify that I served the above and foregoing Motion to Withdraw via U.S. first class mail to the person to whom said Notice is directed on or before November 12, 2022. I served the above and foregoing Motion to Withdraw to those listed on the Service List noted below via the ECF, electronic filing system of the US Bankruptcy Court.

SERVICE LIST

Gregory Stern
53 W. Jackson Boulevard, Suite 1442
Chicago, Illinois 60604

Patrick S. Layng Office of the U.S. Trustee
Region 11
219 South Dearborn Street, Room 873
Chicago, Illinois 60604

David R. Herzog
Law Offices of David R. Herzog
53 West Jackson Blvd, Suite 1442
Chicago, Illinois 60604

Debra Devassy Babu
Askounis & Darcy, PC
444 North Michigan Avenue, Suite 3270
Chicago, Illinois 60611

Jamie L Burns
Levenfeld Pearlstein, LLC
2 North LaSalle Street, Suite 1300
Chicago, Illinois 60602

Whitman H. Brisky
Mauck & Baker LLC
1 North LaSalle Street, Suite 600
Chicago, Illinois 60602

Christopher R. Schmidgal
Law Office of Garry A. Weiss, PC
Six West 73rd Avenue
Merrillville, Indiana 46410

Charles Tatelbaum
Tripp Scott PA
110 SE 6 Street, 15th Floor
Fort Lauderdale, Florida 33301

James M. Yannakopoulos
Koransky Bouwer & Poracky PC
425 Joliet Street, Suite 425
Dyer, Indiana 46311

Bryan D King Brown
Udell Pomerantz Delrahim
225 W. Illinois, Suite 300
Chicago, IL 60654

Daniel S Hefter
Hefter Law, Ltd.
22 W. Washington, Suite 1500
Chicago, IL 60602

Cindy M. Johnson
Johnson Legal Group, LLC
140 S. Dearborn, Ste 1510
Chicago, IL 60603

Victor J. Allen
Justin Mertz
Michael, Best & Friedrich, LLP